

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CINDY GLASS PEASLEE,	)	
	)	
Plaintiff,	)	
	)	No. 08 C 3167
v.	)	
	)	Judge Samuel Der-Yeghiayan
ILLINOIS STUDENT ASSISTANCE	)	
COMMISSION,	)	
	)	
Defendant.	)	

**DEFENDANT’S AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR  
MOVE TO DISMISS and RESET INITIAL STATUS HEARING**

Defendant, the Illinois Student Assistance Commission (hereinafter “ISAC”), by and through its attorney, LISA MADIGAN, Illinois Attorney General, respectfully requests this Honorable Court grant them an extension of time to answer or move to dismiss Plaintiff’s Complaint to and including August 30, 2008 and further requests that the Court re-set the Initial Status hearing currently scheduled for August 5, 2008. In support thereof, Defendant states as follows:

1. Plaintiff filed the instant action against ISAC on June 2, 2008 claiming a violation of the Fair Credit Reporting Act, 15 U.S.C. §1681, *et seq.*
2. A waiver of service was sent to ISAC on or about June 2, 2008 which gave ISAC sixty (60) days, or until August 1, to appear and file an answer or motion in response to the complaint.
3. This case was not assigned to counsel for Defendant until August 30, 2008.
4. Plaintiff’s counsel has agreed to an extension of time to and including August 30, 2008 for ISAC to answer or file a motion to dismiss.

5. Additionally, as this matter was just recently assigned to counsel for Defendants, the parties have been unable to conduct the FRCP 26(f) conference and submit an initial status report prior to the initial status hearing as directed in the Court's order of June 6, 2008. The parties therefore respectfully request that the Court re-set the initial status hearing currently set for August 5, 2008.

WHEREFORE, Defendant ISAC respectfully requests this Honorable Court grant it until August 30, 2008 to answer or move to dismiss Plaintiff's complaint and re-set the initial status hearing in this matter.

Respectfully submitted,

/s/ Meghan O. Maine  
Counsel for Defendant ISAC  
Assistant Attorney General  
General Law Bureau  
100 West Randolph Street, 13<sup>th</sup> Floor  
Chicago, IL 60601  
(312) 814-5165  
[mmaine@atg.state.il.us](mailto:mmaine@atg.state.il.us)

/s/ Alyssa Hicks Blackwell  
Counsel for Plaintiff  
Larry P. Smith & Associates, Ltd.  
205 N. Michigan Ave.  
Suite 4000  
Chicago, IL 60601  
(312) 222-9028  
[ablackwell@lpsmithlaw.com](mailto:ablackwell@lpsmithlaw.com)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2008, I electronically filed the above document, with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

Respectfully submitted,

/s/ Meghan O. Maine  
Assistant Attorney General  
General Law Bureau  
100 West Randolph Street, 13<sup>th</sup> Floor  
Chicago, IL 60601  
(312) 814-5165  
[mmaine@atg.state.il.us](mailto:mmaine@atg.state.il.us)